

JAP:DKK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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**15M 889**

UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

JESUS ROBERTO RODRIGUEZ RAMIREZ,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

EDWARD GONZALEZ, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about September 17, 2015, within the Eastern District of New York and elsewhere, the defendant JESUS ROBERTO RODRIGUEZ RAMIREZ did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:<sup>1</sup>

1. On or about September 17, 2015, the defendant JESUS ROBERTO RODRIGUEZ RAMIREZ, a citizen of the Dominican Republic, arrived at John F. Kennedy

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<sup>1</sup> Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

International Airport (“JFK”) in Queens, New York aboard Jet Blue Flight 936 from Santiago, Dominican Republic.

2. The defendant JESUS ROBERTO RODRIGUEZ RAMIREZ was selected for a Customs and Border Protection (“CBP”) examination. The defendant presented one black suitcase for inspection.

3. The defendant JESUS ROBERTO RODRIGUEZ RAMIREZ claimed ownership of the suitcase and its contents.

4. An inspection of the defendant JESUS ROBERTO RODRIGUEZ RAMIREZ’s suitcase revealed a false side. CBP officers probed the false side of the defendant’s suitcase, revealing a white powdery substance.


5. The white powdery substance found in the defendant JESUS ROBERTO RODRIGUEZ RAMIREZ’s suitcase field-tested positive for cocaine. The total approximate gross weight of the cocaine recovered was 1.4269 kilograms.

6. The defendant was then placed under arrest.

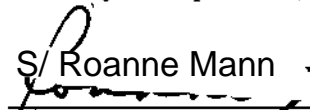
7. After he was placed under arrest, the defendant was read his Miranda rights, voluntarily waived those rights, and agreed to talk with law enforcement. The defendant then stated, in sum and substance, that he knew he was carrying an illegal drug in the form of a white powdery substance, although he believed the drug to be heroin.

WHEREFORE, your deponent respectfully requests that the defendant JESUS ROBERTO RODRIGUEZ RAMIREZ be dealt with according to law.

Dated: Brooklyn, New York  
September 18, 2015

  
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EDWARD GONZALEZ  
Special Agent  
United States Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
18th day of September, 2015

  
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S/ Roanne Mann  
THE HONORABLE ROANNE L. MANN  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK